

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	
Michael Blair	:	Chapter 13
	:	
Debtors	:	
	:	Case No.: 16-15389

MOTION FOR COURT APPROVAL OF MODIFICATION OF MORTGAGE

1. The above-referenced Chapter 13 Bankruptcy was filed on or about July 29, 2016.
2. The Chapter 13 Bankruptcy was assigned case number 16-15389.
3. The instant Chapter 13 matter was confirmed by this Honorable Court on January 31, 2017.
3. The instant Bankruptcy was filed for the primary purpose of staying mortgage foreclosure and repaying mortgage arrears due and owing on the first and second mortgage at the time of filing.
4. At the time of filing the instant Motion, the Debtor is current on his obligations to the Chapter 13 Trustee.
5. On or about September 4, 2018, the Debtor was offered a trial mortgage modification by his second mortgagee Police and Fire Federal Credit Union. A true and correct copy of the September 4, 2018 trial mortgage modification offer is attached hereto and labeled as **Exhibit "A."**
6. The trial plan payments were made at \$727.66 per month for the period of three consecutive months beginning on September 1, 2018.

7. Per page two of the trial mortgage modification the Debtor made his trial payments to Police and Fire Federal Credit Union and his contractual payments to Wells Fargo on a regular and monthly basis.

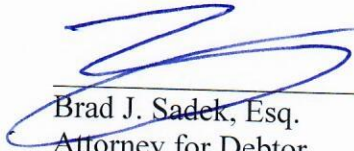
8. Accordingly, this instant Motion is being filed to allow the Debtor to combine the two loans into one loan through Police and Fire Federal Credit Union.

9. Said refinance/restructure would allow the Debtor to combine both loans into one, lower/eliminate the Chapter 13 trustee payment and save money on a regular and monthly basis on total mortgage payments.

10. Upon approval of the Mortgage Modification and refinance of the two mortgage loans into one loan, the Debtor will timely file an Amended Chapter 13 Plan.

WHEREFORE, for the reasons stated hereinabove the Debtors respectfully request the proposed mortgage modification be approved by this Honorable Court.

DATE: 12/17/18



Brad J. Sadek, Esq.
Attorney for Debtor